

SINGER

July 6, 1982

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EPA, REGION III
OFFICE OF REGIONAL ADMINISTRATOR

Mr. Peter Bibko
Regional Administrator
U.S. Environmental Protection Agency
Curtis Building
Sixth and Walnut Streets
Philadelphia, PA 19106

Dear Mr. Bibko:


In conformance with the requirements of Subpart H of 40 CFR parts 264 & 264, The Singer Company submits the attached document indicating its intent to purchase closure insurance for its U.S. facilities listed below:

<u>Facility</u>	<u>EPA ID Number</u>	<u>Closure Cost Estimate</u>
The Singer Company Link Flight Simulation Division Kirkwood Facility Binghamton, NY 13902	NYD002230860	\$20,000
The Singer Company Link Flight Simulation Division Hillcrest Facility Binghamton, NY 13902	NYD0000818468	\$20,000
The Singer Company Industrial Sewing Division 312 First Street Elizabeth, NJ 07207	NJD002169506	\$38,810
The Singer Company Kearfott Division 1370 San Marcos Blvd. San Marcos, CA 92069	CAD046589305	\$22,108
The Singer Company Kearfott Division Route 70 Black Mountain, NC 28711	NCD0836736681	\$50,000

The Singer Company Kearfott Division 1225 McBride Avenue Little Falls, NJ 07424	NJD002148484	\$26,456
The Singer Company Kearfott Division 90 New Dutch Lane Fairfield, NJ 07006	NJD065812950	\$1,825
The Singer Company Kearfott Division 15 Jackson Road Totowa, NJ 07511	NJD000768119	\$1,385
The Singer Company Kearfott Division 150 Totowa Road Wayne, NJ 07470	NJD053509568	\$795
The Singer Company Education Division 3750 Monroe Avenue Rochester, NY 14603	NYD002205987	\$10,000
The Singer Company HRB Singer Division Science Park P.O. Box 60 State College, PA	PAD001923481	\$9,000
The Singer Company Furniture Division 1914 Hickory Blvd. North West P.O. Box 1588 Lenior, NC 26854	NCD000604322	\$25,000
The Singer Company Meter Division 920 Payne Avenue Erie, PA	PAD050942291	<u>\$ 3,000</u>
Total		\$228,379

The Company will submit within 90 days a certificate of insurance as required.

Sincerely,



Austin Shepherd
Corporate Manager of Environmental Control

AS:lse
4276X



Peat, Marwick, Mitchell & Co.

Certified Public Accountants

345 Park Avenue
New York, New York 10154

Mr. A. E. MacKay
The Singer Company
8 Stamford Forum
Stamford, Connecticut 06904

Dear Mr. MacKay:

We have examined the financial statements of The Singer Company and consolidated subsidiaries as of and for the year ended December 31, 1981 and have issued our report thereon dated February 10, 1982. Our examination was made in accordance with generally accepted auditing standards, and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

At your request, we have performed the procedure stated below with respect to your letter dated July 2, 1982 to the Regional Administrator of the U.S. Environmental Protection Agency (the letter).

We agreed the amounts reported in items 2 through 6 on page 3 of the letter with the above mentioned financial statements of The Singer Company and consolidated subsidiaries as of and for the year ended December 31, 1981.

In connection with the procedure referred to above, we found the amounts reported in items 2 through 6 of the letter to be in agreement with the financial statements.

It is understood that this report is solely to meet certain requirements of the U.S. Environmental Protection Agency and is not to be referred to or distributed for any purpose to anyone other than the management of The Singer Company or the U.S. Environmental Protection Agency.

Peat Marwick, Mitchell & Co.

July 2, 1982



NORTHWESTERN NATIONAL INSURANCE GROUP

HOME OFFICE: 731 NORTH JACKSON STREET / P. O. BOX 2070 / MILWAUKEE, WISCONSIN 53201 / PHONE (414) 765-8444

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ENVIRONMENTAL CONTROL

July 2, 1982

Mr. Austin Sheppard
The Singer Company
8 Stamford Forum
Stamford, CT 06904

RE: CLOSURE INSURANCE

Dear Mr. Sheppard:

The Singer Company of 8 Stamford Forum of Stamford, Connecticut has approached Northwestern National Insurance Company concerning the issuance of closure insurance to its U.S. facilities as required under Sub. Part H of 40 CFR 264 and 265. Northwestern National Insurance Company is currently considering issuance of this insurance.

Sincerely,

James A. Kellogg
Assistant Vice President

JAK/llg

cc: N. DeRosa
W. Miller

SINGER

July 2, 1982

Mr. Peter Bibko
Regional Administrator - Region III
U.S. Environmental Protection Agency

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EPA, REGION III
OFFICE OF REGIONAL ADMINISTRATOR

Gentlemen:

I am the chief financial officer of The Singer Company, Stamford Forum, Stamford, Connecticut 06904. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

<u>Facility</u>	<u>EPA ID Number</u>
The Singer Company Link Flight Simulation Division Kirkwood Facility Binghamton, NY 13902	NYD002230860
The Singer Company Link Flight Simulation Division Hillcrest Facility Binghamton, NY 13902	NYD0000818468
The Singer Company Industrial Sewing Division 312 First Street Elizabeth, NY 07207	NJD002169506
The Singer Company Kearfott Division 1370 San Marcos Blvd., San Marcos, CA 92069	CAD046589305
The Singer Company Kearfott Division Route 70 Black Mountain, NC 28711	NCD083673681

<u>Facility</u>	<u>EPA ID Number</u>
The Singer Company Kearfott Division 1225 McBride Avenue Little Falls, NJ 07424	NJD002148484
The Singer Company Kearfott Division 90 New Dutch Lane Fairfield, NJ 07006	NJD065812950
The Singer Company Kearfott Division 15 Jackson Road Totowa, NJ 07511	NJD000768119
The Singer Company Kearfott Division 150 Totowa Road Wayne, NJ 07470	NJD053509568
The Singer Company Education Division 3750 Monroe Avenue Rochester, NY 14603	NYD002205987
The Singer Company HRB - Singer Division Science Park P.O. Box 60 State College, PA 16801	PAD001923481
The Singer Company Furniture Division 1914 Hickory Blvd. Lenior, NC 28654	NCD000604322
The Singer Company Meter Division 920 Payne Avenue Erie, PA 16512	PAD050942291

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1981.

Liability Coverage for Accidental Occurances - Financial Test

1.	Amount of Annual Aggregate liability covery to be demonstrated.	\$	2,000,000
2.	Current Assets.	*	1,084,100,000
3.	Current Liabilities.	*	735,100,000
4.	Net Working Capital.	*	349,000,000
5.	Tangible Net Worth.	*	416,500,000
6.	Total U.S. Assets.	*	842,200,000
		YES	NO
7.	Is line 5 at least 10,000,000	<u>X</u>	_____
8.	Is line 4 at least 6 times line 1.	<u>X</u>	_____
9.	Is line 5 at least 6 times line 1.	<u>X</u>	_____
10.	Are at least 90% of Assets located in U.S.	_____	<u>X</u>
11.	Is line 6 at least 6 times line 1.	<u>X</u>	_____

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

C. E. MacKay
A. E. MacKay
Sr. Vice President Finance
July 2, 1982

AS/mm
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